

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

**In re:**

**Bourbon Street LLC,  
dba La Cantina,**

**Bankruptcy No. 23-30246  
Chapter 11- Subchapter V**

**Debtor**

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**Petri Enterprises, LLC,  
dba La Cantina,  
dba Heros and Legends Sports Bar,  
dba Heros and Legends,**

**Bankruptcy No. 23-30247  
Chapter 11 – Subchapter V**

**Debtor**

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**Gannet Peak, LLC,  
dba La Cantina,**

**Bankruptcy No. 23-30248  
Chapter 11 – Subchapter V**

**Debtor**

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**Limited Objection to Motion**

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COMES NOW the Acting United States Trustee (UST) through the undersigned attorney, Sarah J. Wencil, and submits a limited objection to the Motion to Enter into Lease Agreements with Insiders (Doc. 82). In support of the objection, the UST states the following:

1. The deadline to objection is September 26, 2023.
2. The UST objects to the lack of verification by an insider of the debtor to the assertion that the amounts of rent proposed to be paid by Petri Enterprises and Gannett Peak are coorelative to the debt service payments owed yb Mr. Petri and Wyoming Flats on the respective real estate assets or are otherwise reasonable under the market

conditions. Since this transaction is with an insider, the verification or sworn statement by the insider regarding the representations of reasonableness should be provided.

3. The UST raised this request in an email to Debtors' counsel on approximately September 22, 2023, and counsel has stated that such a verification or affidavit will be forthcoming.

4. If the information is verified, the UST will withdraw her objection.

WHEREFORE, the UST requests that her concerns raised herein be addressed or the Court overrule the motions as appropriate.

Dated: September 26, 2023

MARY R. JENSEN  
ACTING U.S. TRUSTEE REGION 12

/s/ Sarah J. Wencil  
Sarah J. Wencil  
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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

**In re:**

**BOURBON STREET LLC**

**Bankr. No. 23-30246**

**Chapter 11**

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**In re:**

**PETRI ENTERPRISES, LLC**

**Bankr. No. 23-30247**

**Chapter 11**

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**In re:**

**GANNETT PEAK, LLC**

**Bankr. No. 23-30248**

**Debtor.**

**Chapter 11**

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**CERTIFICATE OF SERVICE**

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Sarah J. Wencil, an employee of the U.S. Trustee office, hereby certifies the filing of this document caused service via CM/ECF upon all CM/ECF recipients.

Dated: September 26, 2023

/s/ Sarah J. Wencil  
Sarah J. Wencil